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Office of Enforcement  
Compliance & Environmental Justice

**ENGINEERING MANAGEMENT SUPPORT INC.**

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January 10, 2019

U.S. Environmental Protection Agency  
Region VIII  
1595 Wynkoop Street  
Denver, Colorado 80202-1129  
Mail Code: 8EPR-SR

**ATTENTION:** Ms. Linda Jacobson

**SUBJECT: Quarterly Status Report – Fourth Quarter 2018  
Katzson Brothers, Inc. 960 Vallejo St., Denver, CO**

Dear Ms. Jacobson,

On behalf of Katzson Brothers, Inc. (Katzson), Engineering Management Support Inc. (EMSI) submits the attached status report for the fourth quarter of 2018 as required by paragraph XI of the Administrative Order on Consent, Docket No. RCRA-08-2007-0001. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,  
**ENGINEERING MANAGEMENT SUPPORT, Inc.**



Paul V. Rosasco, P.E.

Attachment

Distribution:

Colleen Brisnehan – CDPHE  
Judy Koyama – East West Specialty Sauces  
Richard Right – Katzson Brothers, Inc.  
Elizabeth Temkin – Davis Graham & Stubbs, LLP

**Quarterly Status Report  
Fourth Quarter 2018  
Katzson Brothers 960 Vallejo St. Facility**

This Quarterly Status Report (QSR) has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Katzson Brothers, Inc. (Katzson) for the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at Katzson's 960 Vallejo St, Denver, Colorado facility, as required by paragraph XI. A. of the Administrative Order on Consent, Docket No. RCRA-08-2007-0001 (the Order) and Section 6 of the RFI Work Plan. This quarterly status report covers the period from October through December 2018.

**1. Actions, Progress and Status of Projects Undertaken Pursuant to the Order**

The following is a summary of the activities, progress to date, and the status of the various investigations required pursuant to the RFI Work Plan:

**RFI Task 1.1 – Drilling, Soil Sampling and Monitoring Well Installation**

- This task was completed during the fourth quarter of 2006.

**RFI Task 1.2 – Groundwater Level Measurements**

- This task was completed during the first quarter of 2008.
- Additional groundwater level measurements have been collected in conjunction with various groundwater monitoring events listed below.
- Additional water level measurements were collected on November 13, 2013 from groundwater monitoring wells and ISCO injection and monitoring points located on the Katzson (960 Vallejo St) and East-West Specialty Sauces, Inc. (East-West) [950 Vallejo St] properties.

**RFI Task 1.3 – Groundwater Quality Sampling and Analysis**

- Groundwater sampling activities for site characterization required by the RFI Work Plan were completed during the third quarter of 2007.
- Additional groundwater samples were collected and submitted for laboratory analyses in May and June 2009 prior to performance of the Phase I ISCO pilot-test.
- Additional groundwater samples were collected in April 2010 and March 2011 in conjunction with the post-Phase I ISCO groundwater monitoring activities.
- Groundwater samples were collected from the Phase II ISCO injection and monitoring points in September 2011 prior to performance of the Phase II ISCO injection.

- Groundwater samples were collected from the Phase II ISCO injection and monitoring points, the Phase I injection and monitoring points, and the site groundwater monitoring wells in July 2012 as part of the post-Phase II ISCO pilot test groundwater monitoring event.
- Groundwater samples were collected from selected Phase II ISCO injection and monitoring points in January 2013.
- A groundwater sample was collected from new monitoring well MW-10 on August 1, 2013.
- As part of the Railroad Scale Pit Vault Corrective Action, baseline (prior to treatment by In-Situ Chemical Reduction [ISCR]) groundwater samples were collected on October 18 and 24, 2015 from groundwater monitoring wells MW-6 and MW-10 and injection wells 2I-1, 2I-4, 6I-1, 6I-2, 6I-3, 6I-4, 6I-5, 6I-7, 6I-8, 6I-9 and 6I-10 (Note: injection point 6I-6 was dry).
- Groundwater samples were collected post-ISCR on May 3-4, 2016 and analyzed for VOCs, sulfate, sulfite, total (unfiltered) iron, dissolved (filtered) iron, and total organic carbon (TOC). Injection point 6I-5 was not sampled because it is located under the impermeable membrane cover and an access port has yet to be constructed. Also, there was insufficient water in 2M-1 and 6I-6 to collect samples for all parameters.
- Groundwater samples were collected post-ISCR on September 29, 2016 and analyzed for VOCs, sulfate, sulfite, total (unfiltered) iron, dissolved (filtered) iron, and total organic carbon (TOC). Injection point 6I-8 was not sampled because it was dry. Also, there was insufficient water in 2M-1, 6I-1, 6I-3, 6I-6, 6I-7, and 6I-10 to collect samples for all parameters.
- Groundwater samples were collected post-ISCR on March 17, 2017 and analyzed for VOCs, sulfate, sulfite, total (unfiltered) iron, dissolved (filtered) iron, and total organic carbon (TOC). Injection point 6I-3 and 6I-8 were not sampled because they produced insufficient water for collection of samples.
- Groundwater samples were collected post-ISCR on November 13, 2017 and analyzed for VOCs, sulfate, sulfite, total (unfiltered) iron, dissolved (filtered) iron, and total organic carbon (TOC); however, insufficient water was produced from some of the injection points to allow for completion of all of the analyses. Furthermore, injection point 6I-6 and 6I-8 were not sampled because they produced insufficient water for collection of samples.

#### RFI Task 2.1 – Sewer Line Characterization

- This task was completed during the second quarter of 2008.

#### RFI Task 2.2 – Northern Property Boundary

- A Phase I ISCO pilot test was conducted in August 2009. Extensive monitoring for both the presence of oxidant and groundwater quality was performed subsequent to the test, including post-ISCO groundwater monitoring performed in March 2011.

- A Phase II ISCO pilot test was conducted in October 2011. Pre-Phase II ISCO test groundwater monitoring was conducted in September 2011. Post-Phase II groundwater monitoring was performed in July 2012 and January 2013.
- In situ chemical reduction (ISCR) in and around the concrete vault area was performed in October 2015. Post-ISCR groundwater monitoring was performed in May 2016, September 2016 and November 2017.

#### RFI Task 3.0 – Indoor Air Monitoring

- The indoor air and sub-slab sampling activities were completed and the data were reported in the first quarter of 2007.
- A new heating, ventilation, and air conditioning (HVAC) was installed in July 2012 to increase the air-exchange rate within the office areas of the Katzson building. Additional indoor air sampling was conducted over a 24-hour period on August 25-26, 2012.
- Indoor air sampling was conducted at the East-West facility in January 2013.
- Active sub-slab depressurization systems (ASSDSs) were installed in July and crack sealing was performed in July and August 2013 at the East-West facility in accordance with the June 5, 2013 Work Plan for Additional Work at the Katzson facility.
- Vacuum performance measurements for the ASSDSs were collected on November 17, 2013.
- Indoor air sampling was conducted at the East-West facility in December 2013.
- Additional indoor air sampling was conducted at the East-West facility in March 2014.
- Indoor air sampling was conducted within the offices of the Katzson building over a 24-hour period on March 12-13, 2016.
- Additional indoor air sampling was conducted at the East-West facility on March 15-16, 2017.
- Indoor air sampling was conducted at the offsite property to the north.

#### Public Participation Plan

- Contact information and a fact sheet have been sent to adjacent property owners. Interviews have been conducted with some of the adjacent property owners and with the City and County of Denver.

#### RCRA Facility Investigation (RFI) Report

- The final RFI report was prepared and submitted to EPA and CDPHE on August 10, 2011.
- EPA approved the RFI report on August 25, 2011.

#### Corrective Measures Study (CMS)

- A draft CMS Work Plan was prepared and submitted to EPA and CDPHE on November 7, 2011.
- EPA and CDPHE comments on the draft CMS Work Plan were received on March 6, 2012.
- A revised CMS Work Plan was submitted to EPA and CDPHE on April 6, 2012.
- EPA approval of the revised CMS Work Plan was received on September 13, 2012.
- Work on the CMS continued during the third quarter of 2018.

### **2. Issues Affecting Order Requirements**

None.

### **3. Projects Completed This Quarter and Activities Scheduled for Next Quarter**

During this quarter, the following projects were conducted and/or completed:

- The Quarterly Status Report for the third quarter of 2018 was prepared and submitted to EPA and CDPHE on October 10, 2018.
- The East-West sub-slab depressurization system fan performance indicators (ammeters) were checked and indicated that the system was operating in a manner consistent with the design specifications and in accordance with the established operational parameters.
- Work continued toward preparation of the CMS report.
- Work was performed toward assembling documents in response to a request from East-West Specialty Sauces for a set of certain site documents and data.

The following activities are anticipated to be conducted over the next quarter:

- Completion of assembly of documents responsive to East-West's request;
- Continued preparation of a draft CMS; and
- Continued monitoring of the sub-slab depressurization system at the East-West Facility.

#### **4. Percentage of Studies Completed**

Based on the work completed to date, the following is an estimate of the percentage completion of each of the investigation tasks in the RFI Work Plan:

<u>Task</u>	<u>Description</u>	<u>Percent Complete</u>
1.1	Drilling, soil sampling and monitoring well installation	100%
1.2	Groundwater level measurements	100%
1.3	Groundwater quality sampling and analyses	100%
2.1	Sewer line characterization	100%
2.2	Northern property boundary	100%
3.0	Indoor air monitoring	100%

#### **5. Description and Summary of Findings**

Monitoring of the East-West sub-slab depressurization system fan performance indicators (ammeters) indicates that the system was operating in a manner consistent with the design specifications and in accordance with the established operational parameters.

#### **6. Actions Taken to Address Issues**

No issues affecting the performance of the work were identified this quarter and therefore no actions were necessary.

#### **7. Changes in Personnel**

No changes in project personnel occurred during this quarter.

#### **8. Results of Sampling and Testing**

None.